

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON and JAMES
EVERETT SHELTON, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff

vs.

AGENTRA, LLC, KAREN MARIE
EDWARDS, ANGELIC MARKETING
GROUP L.L.C., THERESA JONES and
MATTHEW JONES

Defendants.

Case No. 18-cv-615-RCM

COMPLAINT-CLASS ACTION

REQUEST TO ENTER DEFAULT

TO: Clerk of the United States District Court for the Western District of Pennsylvania

The Plaintiffs Stewart Abramson and James Everett Shelton request that you please enter default for the defendants Angelic Marketing Group L.L.C. and Matthew Jones for their failure to plead or otherwise defend as required by the Federal Rules of Civil Procedure as appears from the affidavit of Anthony I. Paronich, attached hereto as Exhibit 1, and a proposed Order is attached as Exhibit 2.

Dated: May 13, 2019

PLAINTIFF,
By his attorney,

/s/ Anthony I. Paronich

Anthony I. Paronich
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CERTIFICATE OF SERVICE

I, hereby certify that on May 13, 2019, I filed the foregoing with the Court's CM/ECF system, which served the same on the counsel of record. I also electronically transmitted the request to the remaining parties.

/s/ Anthony Paronich
Anthony Paronich